

FILED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
DIVISION

SEP 28 2018

David J. Bradley, Clerk of Court

IMEH U. AFFIAH

versus

TEXAS SOUTHWEST COLLEGE§
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§
§
§

CIVIL ACTION NO. _____

EMPLOYMENT DISCRIMINATION COMPLAINT

1. This action is brought under Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is conferred by Title 42 United States Code, Section § 2000e-5.

2. The Plaintiff is:

IMEH U. AFFIAH

Address:

10001 CLUB CREEK DRIVE
#207, HOUSTON, TX. 77036

County of Residence:

HARRIS

3. The defendant is:

TEXAS SOUTHWEST COLLEGE

Address:

80 FORT BROWN
BROWNSVILLE, TX. 77820

☐ Check here if there are additional defendants. List them on a separate sheet of paper with their complete addresses.

4. The plaintiff has attached to this complaint a copy of the charges filed on 10/20/17 with the Equal Opportunity Commission.

5. On the date of 7/6/18, the plaintiff received a Notice of Right to Sue letter issued by the Equal Employment Opportunity Commission; a copy is attached.

6. Because of the plaintiff's:

- (a) ☒ race
 (b) ☒ color
 (c) ☐ sex
 (d) ☐ religion
 (e) ☒ national origin,

the defendant has:

- (a) ☐ failed to employ the plaintiff
 (b) ☐ terminated the plaintiff's employment
 (c) ☐ failed to promote the plaintiff
 (d) ☐ other: failed to renew the plaintiff's
employment contract.

7. When and how the defendant has discriminated against the plaintiff:

- ① The plaintiff's contract was not renewed and was not given opportunity to earn a living whereas another administrator of different race contract was not renewed was immediately given another position to earn a living. ② The plaintiff was denied opportunity to participate in meetings and activities that others at similar position participated. ③ The Interim President (Mike Shanna) refused to hold any meeting with the plaintiff while holding regular meetings with others of similar position - P. 70

8. The plaintiff requests that the defendant be ordered:

- (a) ☐ to stop discriminating against the plaintiff
 (b) ☐ to employ the plaintiff
 (c) ☐ to re-employ the plaintiff
 (d) ☐ to promote the plaintiff

- ④ The plaintiff was immediately replaced by a white employee with lesser credentials and years of experience as the plaintiff.
- ⑤ Some employees openly voiced their opinion of being uncomfortable working with the plaintiff (black) since they have not worked ^{around} ~~with~~ someone of similar race in the past.
- ⑥ The Director of Human Resources was constantly harassing the plaintiff to meet with her one on one for employment or hiring process whereas the plaintiff has participated with others during the hiring process briefings. This action was not extended to others at similar position according to the plaintiff's knowledge.

- (e) ☒ to pay for punitive damages, loss of
income, provide recommendations
for gainful employment and that;
- (f) ☒ the Court grant other relief, including injunctions, damages, costs and attorney's fees.


(Signature of Plaintiff)

Address: 10001 CLUB CREEK DRIVE
#207, Houston, TX 77036

Telephone: (337) 962 8224